

EXHIBIT A

FELICELLO

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VIA EMAIL

May 29, 2025

Amiad Kushner
Counsel for Robert W. Seiden
Seiden Law Group
322 Eighth Avenue
New York, NY 10001
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Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-VF (S.D.N.Y.)

Dear Mr. Kushner:

We represent Link Motion, Inc. (“LKM”) and Vincent Wenyong Shi in the above-referenced matter. In light of the Court’s May 19, 2025 order (ECF No. 549 at 39-40) discharging Robert W. Seiden (“Mr. Seiden”) as receiver for LKM, we hereby demand the immediate return of all corporate books and records concerning LKM that are in Mr. Seiden’s possession, custody, or control.

Mr. Seiden took custody of LKM’s books and records pursuant to § II(2)(c) of the Court’s February 1, 2019 receivership order. *See* ECF No. 26 at 4. Pursuant to the Court’s May 19, 2025 order, Mr. Seiden “is no longer bound by and is hereby discharged and released from his duties, obligations, and responsibilities as set forth in the Receivership Order (Dkt. No. 26). . . .” Because Mr. Seiden is now discharged from the office of receiver, he is now obligated to return the books and records to the board of directors. *See* [§ 2193. Custody of books and records—Custodian, 5A Fletcher Cyc. Corp. § 2193](#) (“It is the duty of retiring officers to turn the custody and possession of the corporate books and records over to their successors in office”).

Accordingly, please deliver to our offices all tangible books and records of LKM that are currently in the possession, custody, or control of Mr. Seiden. If such records are in electronic form, deliver them on media (e.g., USB drive) or upload to the following link:

<https://felicellolaw.sharefile.com/r-rf65ca9af2bc0405e8e6e36c6987b8161>

We also request that Mr. Seiden stipulate to the termination and discharge of the receiverships in the Cayman Islands and Hong Kong. Please confirm at your earliest convenience that Mr. Seiden will so stipulate.

Amiad Kushner, Esq.

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Finally, please advise if you continue to represent Mr. Lilin “Francis” Guo or, if not, the contact information for Mr. Guo’s current counsel. If Mr. Guo is not represented by counsel, please provide his last known contact information at your earliest convenience.

Respectfully submitted,

/s/ Michael James Maloney

Michael James Maloney